



SALON MARROW

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August 28, 2020

**VIA ECF**

The Honorable Loretta A. Preska  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, NY 10007

Counsel's request to file the below exhibits  
 under seal is granted. SO ORDERED.

*Loretta A. Preska* 8/28/2020

**Re: Peterson, et al. v. Islamic Republic of Iran, et al., No. 13-cv-9195 (LAP)**

Dear Judge Preska:

We are co-counsel to the Plaintiffs and write to request permission to file certain exhibits annexed to the Vogel Declaration in support of the Plaintiffs' Motion for Summary Judgment and Preliminary Injunction (ECF No. 233) under seal. The Defendants have designated material to be redacted from 26 exhibits based upon protective orders that governed filings in *Peterson v. Iran*, S.D.N.Y. Case No. 10-cv-4518 ("*Peterson I*"),<sup>1</sup> an order issued on August 4, 2017 by this Court in *Peterson I* approving certain redactions, a copy of which is submitted as Exhibit A (the "*Peterson I* Redaction Order"), and an order issued on October 18, 2017 by the Second Circuit Court of Appeals in *Peterson v. Iran*, Case No. 15-0690, approving certain redactions, a copy of which is submitted herewith as Exhibit B (the "*Peterson II* Redaction Order").

The following exhibits have been redacted in part by the Defendants and filed in redacted form on the ECF docket in this case at the corresponding document numbers listed below:

EXHIBIT	ECF NO.
13	233-13
14	233-14
16	233-16
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45	233-45
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<sup>1</sup> Protective Order entered June 11, 2008 in *Peterson v. Iran*, D.D.C. Case No. 01-2094(RCL); Sealing Order entered June 8, 2010 in *Peterson I*; and Stipulated Protective Order Governing the Production of Confidential Materials entered July 10, 2013 in *Peterson I*, copies of which are submitted herewith as Exhibits C, D and E, respectively.



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63	233-63 and 233-64
66	233-67 and 233-68
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71	233-73
72	233-74
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Redacted and un-redacted copies of the above-listed exhibits will be submitted for Your Honor's review via an FTP link in an email to [PreskaNYSDChambers@nysd.uscourts.gov](mailto:PreskaNYSDChambers@nysd.uscourts.gov).

For 24 of the 26 exhibits, the documents were already the subject of either the *Peterson I* Redaction Order or the *Peterson II* Redaction Order, both of which directed that the documents be largely unsealed but permitted certain redactions identified by this Court or the Second Circuit, primarily for third-party financial information and personal identifying information that Defendants contend are potentially subject to foreign privacy laws. Because this Court and/or the Second Circuit has already approved redactions for those 24 documents, Defendants submit that the Court should permit the filing of similarly redacted versions of those documents here. The remaining two documents (Exhibits 49 and 81) have been redacted solely to remove personal identifying information Defendants contend is potentially subject to foreign privacy laws, consistent with the guidance set forth in those orders.

Respectfully,

/s/ Liviu Vogel

CC: All counsel (via ECF)

Attachments: Exhibits A-E